

EXHIBIT 94

**DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Felicia Freeman. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Cherokee County in Georgia and my residence address is [REDACTED], Canton, GA 30114.
3. I have lived in Cherokee County for over a decade and am a member of the Allen Temple AME Church. My husband, two daughters and I moved to our current address in Canton just before Thanksgiving in 2015. Prior to that, we lived in Woodstock, also in Cherokee County.
4. When we moved to Canton, I changed my address for my driver's license online with the Cherokee Department of Driver Services. There was an option on the website to change my voter registration at the same time. I opted to change my voter registration so that I would be able to vote at my new address.
5. I received a voter registration card in the mail at my new address telling me that my polling place was the Hopewell Baptist Church on Ridge Road in Canton.
6. I planned to vote on election day in the presidential primaries in 2016. I picked up my two daughters (who were then seven and nine) from school to take them with me to vote. I like them to come with me when I vote so that

they will appreciate the importance of voting. My daughters' school, Sixes Elementary School, was a polling place and was located closer to my house than Hopewell Baptist Church. We drove to the Church to vote because my voter registration card indicated that the Church was my polling place.

7. The line to vote at the Church was out the door. There were about twenty people waiting outside. I remember that it was a chilly day, and I waited with my daughters outside in the elements for at least thirty minutes. Someone came through the line while we were outside to check IDs and distribute the form we were supposed to complete in order to vote.
8. Once my daughters and I got inside, we had to wait for another twenty minutes before we got to the table with the poll workers. My daughters were tired and hungry, but we stayed in line. Once we got to the table, I gave the poll worker my form and my driver's license. The poll worker told me "this isn't your polling place." I explained that I received a voter registration card telling me that Hopewell Baptist Church was my polling place. The poll worker replied, "You're not registered to vote here." I explained that I'd waited in line with my children for almost an hour and asked if there was someone else I could speak to. The poll worker responded, "If you're not registered to vote here, there's nothing I or anyone else can do." I asked where the poll worker's records showed that I was registered, but she said

that she didn't know, and it wasn't listed. I said, "So what am I supposed to do?" and she said that she didn't know and that I should try going to my old polling place. I said that I already waited in line and didn't want to go to a different polling place to wait in line again. The poll worker said that she didn't know what to tell me. She did not offer me a provisional ballot. I left the polling place with my daughters without voting.

9. My kids were upset, and I was upset. When I got home, I posted on Facebook describing my experience and my frustration at being turned away from the polls. My Mom called and asked me if I went to my old polling place to vote there. My mother marched on Washington and was very committed to voting rights. I told her that I did not go to my old polling place because the kids and I were too worn out from waiting in line at the Hopewell Baptist Church. My Mom fussed at me and said, "I didn't do what I did so that you can give up and go back to your house." But my level of frustration was so high that I did not cast my ballot.

10. I wrote a letter to the Cherokee County Board of Elections and explained what had happened. A week and a half later, I received a phone call from someone at the Board of Elections asking me to explain what happened. When I told the person that I changed my voter registration address on the Department of Driver Services website, she said that the voter registration

system is not talking to the DDS system. I said that if that is true, they need to take down the option of changing your address for voter registration on the DDS website. And I pointed out that I received a new voter registration card with my new address and polling place so that this argument didn't make sense. I asked the woman if my address the Board of Elections had on file was my current address. The woman confirmed that it was not.

- 11.** Eventually, my voter registration address was changed to my correct address, but I am not sure how. I never completed another change of address form.
- 12.** After the experience of being turned away at the polls, I try to vote early so that I won't have any issue with my address within Cherokee County. I no longer trust the process, and I want to make sure that I am not turned away again. I voted early in the general election in 2016 and the general election in 2018. For the runoff of the general election in 2018, I voted in person at Hopewell Baptist Church.
- 13.** When I posted on Facebook about being turned away at the polls, I was shocked by the response of my friends. Many people had also experienced being turned away at the polls or other problems voting. My friends and I are well educated. Many of us are leaders in our fields. If this is happening to us, it must also be happening to other people who do not know their rights.

My mother passed in November 2017. It is unfortunate that we are still fighting for the right to vote more than a generation after she and her friends marched on Washington.

14.I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

15. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.

16. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 16 day of October, 2019.



Felicia Freeman